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7 *Attorneys for Defendant*
8 *Sam's West, Inc.*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 KEVIN BROWN, an individual,
12 Plaintiff,
13 v.
14 SAM'S WEST, INC.; ADVANTAGE SALES
AND MARKETING, LLC; and DOES 1
15 through 100;
16 Defendants.

Case No.: 2:15-cv-01964-LDG-CWH

STIPULATION AND [PROPOSED]
ORDER TO EXTEND THE DATE TO
FILE PRE-TRIAL ORDER [FIRST
REQUEST]

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18 WHEREAS, pursuant to the order of this Court (Doc. #93), the parties were to file a Joint Pretrial
19 Order on or before April 20, 2018; and

20 WHEREAS, on February 12, 2018, the Court ordered that Defendant Sam's West can conduct
21 limited discovery as to the loss of consortium claim brought by Plaintiff Jennifer Brown in the matter
22 including re-deposing Jennifer Brown on the loss of consortium claim and disclosing an expert
23 witness, if necessary, and the parties wish to utilize this information in preparation of the Joint
24 Pretrial Order;

25 WHEREAS, the parties are currently engaging in settlement negotiations to resolve this matter in
26 its entirety. Given these discussions, and in order to avoid potentially unnecessary additional fees
27 and costs if this matter settles, the parties stipulate to extend the deadline for the Joint Pre-Trial
28 Order.

1 IT IS HEREBY STIPULATED AND AGREED by and between Betsy C. Jefferis, Esq. of the law
2 firm of PHILLIPS, SPALLAS & ANGSTADT LLC, Attorneys for Defendant Sam's West, Inc. and
3 R. Todd Terry, Esq. and Keely A. Purdue, Esq. of CHRISTIANSEN LAW OFFICES, Attorneys for
4 Plaintiffs Kevin and Jennifer Brown, as follows:

5 That the deadline for filing the Joint Pretrial Order be extended to June 19, 2018.

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7 Respectfully submitted on this 11th day of April, 2018, by:

8 **CHRISTIANSEN LAW OFFICES**
9 */s/ Keely A Purdue*

10 KEELY A. PURDUE, ESQ.
11 Nevada Bar No. 13931
12 801 S. Casino Center Blvd.
13 Las Vegas, NV 89101
14 (702)-240-7979

15 *Attorneys for Plaintiff*
16 *Kevin Brown*

PHILLIPS, SPALLAS & ANGSTADT, LLC
/s/ Betsy C. Jefferis

BETSY C. JEFFERIS, ESQ.
Nevada Bar No. 12980
504 South Ninth Street
Las Vegas, Nevada 89101
(702) 938-1510

Attorneys for Defendant
Sam's West, Inc

17 **IT IS SO ORDERED.**

18 Dated this 12th day of April, 2018.

19 
20 UNITED STATES MAGISTRATE JUDGE
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 11th day of April, 2018, I served a true and correct copy of the
3 foregoing, **STIPULATION AND [PROPOSED] ORDER TO EXTEND THE DATE TO FILE**
4 **PRE-TRIAL ORDER [FIRST REQUEST]**, by facsimile and by U.S. Mail, in a sealed envelope,
5 first-class postage fully prepaid, addressed to the following counsel of record, at the address listed
6 below:
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ATTORNEY OF RECORD	TELEPHONE/FAX	PARTY
PETER S. CHRISTIANSEN, ESQ. Nevada Bar No. 5254 CHRISTIANSEN LAW OFFICES 801 S. Casino Center Blvd. Las Vegas, Nevada 89101	Phone 702-240-7979 Fax 866-412-6992	Plaintiff

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12 */s/ Betsy C. Jefferis*

13 An Employee of PHILLIPS, SPALLAS & ANGSTADT LLC
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